UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MITCHELL H. KOSSOFF, *Plaintiff*, -against- RICKEY FELBERBAUM and FLORIDA FORECLOSURE ATTORNEYS, PLLC, *Defendants*.	Case No. 14 Civ. 1144 (RWS) **DECLARATION OF ERIC R. LEVINE**

ERIC R. LEVINE, an attorney duly admitted to the Bar of this Court, declares the following, pursuant to 28 U.S.C. § 1746:

1. I am a member of the firm of Eiseman Levine Lehrhaupt & Kakoyiannis, P.C., attorneys for defendant Ricky Felberbaum and defendant-counterclaim plaintiff Florida Foreclosure Attorneys, PLLC ("Defendants")

2. I submit this declaration – based upon my knowledge of the facts and circumstances gained through my representation of Defendants – in support of Defendants' motions for orders precluding plaintiff Mitchell Kossoff and his attorneys from mentioning or offering testimony or other evidence at trial concerning the topics as set forth as follows:

Motion *in Limine* No. 1:	Motion *in Limine* to preclude the Report and all testimony of plaintiff's proposed expert witness, Ronald Quintero.
Motion *in Limine* No. 2:	Motion *in Limine* to preclude the testimony of Susan Ulseth;
Motion *in Limine* No. 3:	Motion *in Limine* to preclude evidence that Kossoff owes less than $500,000 under the Note;
Motion *in Limine* No. 4:	Motion *in Limine* concerning plaintiff's proposed Exhibits 1 through 8 and 11 through 19.

3. Attached hereto are true and correct copies of the following Exhibits:

Exhibit A: Report of Ronald Quintero, dated October 2015;

Exhibit B: Deposition Transcript of Ronald Quintero, dated June 28, 2016;

Exhibit C: Relevant Excerpts of the Deposition Transcript of Mitchell Kossoff, dated June 10, 2015;

Exhibit D: Relevant Excerpts of the Deposition Transcript of Mitchell Kossoff, dated June 1, 2015;

Exhibit E: Relevant Excerpts of the Deposition Transcript of Rickey Felberbaum, dated May 15, 2015;

Exhibit F: Joint Pretrial Order, dated September 30, 2016;

Exhibit G: Plaintiff's Rule 26(a)(1) Disclosure, dated October 8, 2014;

Exhibit H: Plaintiff's Responses and Objections to Defendants' First Set of Interrogatories, dated November 7, 2014;

Exhibit I: Restated Promissory Note, dated December 1, 2012;

Exhibit J: Renunciation of Assignment of Membership Units Agreement.

Dated: October 14, 2016
New York, New York

/s/ Eric R. Levine
ERIC R. LEVINE
(elevine@eisemanlevine.com)